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(formerly known as UGS CORP.)

12 |

13 | IN THE UNITED STATES DISTRICT COURT FOR THE

14 | NORTHERN DISTRICT OF CALIFORNIA

15 | SAN FRANCISCO/OAKLAND DIVISION

16 |

Sidebar (vertical text): SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP — Three Embarcadero Center, Suite 1650 — San Francisco, CA 94111 — (415) 788-4220

VANESSA FLINT, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. UGS CORPORATION and DOES 1 through 100, inclusive, Defendants.	**Case No. C-07-4640-CAW** **STIPULATION AND [~~PROPOSED~~] ORDER SHORTENING TIME IN WHICH TO HEAR MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF CLASS NOTICE, AND CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS** **JUDGE: Hon. Claudia A. Wilken** **Civil L.R. 6-2**

STIPULATION AND [PROPOSED] ORDER SHORTENING TIME IN WHICH TO HEAR MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF CLASS NOTICE, AND CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS

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2   Plaintiff Vanessa Flint and defendant Siemens Product Lifecycle Management Software Inc.

3 ("Siemens PLM Software")(formerly UGS Corporation) (together, "Parties"), through their

4 respective counsel, stipulate and agree as follows:

5   1.   A proposed settlement ("the Settlement") of the above-captioned class action has

6 been reached by the Parties.

7   2.   Plaintiff now seeks to move the Court for an order preliminarily approving that

8 Settlement, approving the form and method of class notice, and conditionally certifying a settlement

9 class.

10   3.   Defendant Siemens PLM Software will not oppose Plaintiff's motion for preliminary

11 approval of the Settlement, approval of class notice, and conditional certification of the settlement

12 class.

13   Based on the foregoing, IT IS HEREBY STIPULATED AND AGREED that Plaintiff's

14 Motion for Preliminary Approval of Class Action Settlement, Approval of Class Notice, and

15 Conditional Certification of the Settlement Class shall, with the permission of the Court, be heard on

16 shortened time in the Courtroom of the Honorable Claudia A. Wilken on October 16, 2008, at 2:00

17 p.m ., or as soon thereafter as the matter may be heard by the Court .

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19 DATED: September 24, 2008   SCHUBERT JONCKHEER KOLBE &
                                         KRALOWEC LLP

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21   By: _____/s/_____
                                              MIRANDA P. KOLBE

22   Counsel for Plaintiff

23

24 DATED: September 24, 2008   JACKSON LEWIS LLP

25

26   By: _____/s/_____
                                              JOANNA L. BROOKS

27   Counsel for Defendant

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STIPULATION AND [PROPOSED] ORDER SHORTENING TIME IN WHICH TO HEAR MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF CLASS NOTICE, AND CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS

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2   PURSUANT TO STIPULATION, IT IS SO ORDERED this _____26th_____ day of

3   ____Sept._____, 2008.

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5   _____

6   Hon. Claudia A. Wilken
           United States District Judge

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STIPULATION AND [PROPOSED] ORDER SHORTENING TIME IN WHICH TO HEAR MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF CLASS NOTICE, AND
CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS

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